

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA

CAYUGA MEDICAL CENTER AT
ITHACA, INC.,

Petitioner,

v.

Case No.: 18-1001

NATIONAL LABOR RELATIONS
BOARD,

Respondent.

PETITIONER'S UNOPPOSED MOTION TO
EXTEND TIME TO FILE A BRIEF

Cayuga Medical Center at Ithaca, Inc. ("Petitioner" or "CMC"), in the above-captioned matter, moves to extend the time to file its brief, which is currently due April 23, 2018. Petitioner requests the Court extend the time to file its brief by 14 days, or until May 7, 2018 for the reasons set forth below.

Respondent, the National Labor Relations Board, has advised that they do not oppose this motion.

1. Counsel for the Petitioner, Raymond Pascucci has just returned to the office after undergoing hip surgery.
2. Mr. Pascucci has full-day bargaining sessions and a New York State Division of Human Rights Hearing that will take up every day over the next two weeks.

3. This is the first motion to extend the time to file a brief or pleading filed by Petitioner in this matter. Pursuant to D.C. Circuit Rule 28(e)(2), this motion is filed more than seven days before the brief is due.

Relief Requested

4. Petitioner requests that the Court extend the time to file its brief by 14 days, or until May 7, 2018 and that, if granted, any other filing deadlines for briefing in this matter be similarly extended 14 days .

Respectfully submitted this 5th day of April 2018.

Dated: April 5, 2018

BOND, SCHOENECK & KING,
PLLC

By: /s/Raymond J. Pascucci
Raymond J. Pascucci
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 5, 2018, a copy of the foregoing
**PETITIONER'S UNOPPOSED MOTION TO EXTEND TIME TO FILE A
BRIEF** was served via CM/ECF upon all counsel of record.

/s/ Raymond J. Pascucci

Raymond J. Pascucci

CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies, pursuant to Fed. R. App. P. 32(a)(7)(C)(i), that the foregoing motion complies with the type volume limitation set forth in Fed. R. App. 32(a)(5) and (7)(B)(i), in that the motion uses the Times New Roman 14 point font and contains no more than 7,000 words.

Specifically, in accordance with Fed. R. App. P. 32(a)(7)(C)(i), the Microsoft Word “Word Count” tool indicates that the motion contains 205 words. That word count includes “headings, footnotes, and quotations,” but excludes the “corporate disclosure statement, table of contents, table of citations, any addendum containing statutes, rules or regulations, and any certificates of counsel.” Fed. R. App. P. 32(a)(7)(B)(iii).

/s/ Raymond J. Pascucci

Raymond J. Pascucci